

UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

CRIMINAL COMPLAINT

JOHN CHU
ZHU ZHAOXINCASE NUMBER: 1:04-cr-10156-WGY

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. From on or about March 25, 2004 to on or about May 6, 2004, in the District of

Massachusetts defendant, (Track Statutory Language of Offense)

did unlawfully, willfully and knowingly combine, conspire, confederate and agree with each other and with one or more persons, known and unknown, to commit offenses against the United States, to wit: to export defense articles or defense services designated by the President under 22 U.S.C. 2778(a)(1) without a license for such export, in violation of 22 U.S.C. §2778(b)(2) and (c),

in violation of Title 18 United States Code, Section(s) 371.

I further state that I am a(n) Special Agent, Immigration and Customs Enforcement and that this complaint is based on the following facts:

Official Title

See attached Affidavit of William J. Argue.

Continued on the attached sheet and made a part hereof:

☒ Yes ☐ No

Signature of Complainant

WILLIAM J. ARGUE

Special Agent, ICE

Sworn to before me and subscribed in my presence,

May 6, 2004 @ 11:05PM at
Date

Boston, Massachusetts

City and State

MARIANNE B. BOWLER

Chief United States Magistrate Judge

Name and Title of Judicial Officer

Signature of Judicial Officer